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Chairman Roberts, Ranking Member Stabenow, and members of the Committee, thank you for the opportunity to provide testimony on the crucial importance of pesticides in providing the safe, abundant, and affordable food supply that Americans enjoy and depend on. I am Dr. Sheryl Kunickis, Director of the U.S. Department of Agriculture's (USDA) Office of Pest Management Policy (OPMP). I have worked on behalf of the public for nearly 29 years, including 22 years at the USDA Natural Resources Conservation Service (NRCS). I served as the Associate Deputy Director for Agriculture, Lands, and Wildlife at the White House Council on Environmental Quality (CEQ) in 2008, and completed a detail as the Acting Director of the USDA Office of the Chief Scientist. I have served in my current position as OPMP Director for the past seven years. I earned a Ph.D. in soil science from North Carolina State University and a B.S. and an M.S. in agronomy from Brigham Young University.

OPMP leads USDA activities related to pesticides and pest management, which includes harnessing the Department's expertise to inform federal regulatory actions under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as well as pesticide-related provisions of the Endangered Species Act; the Federal Food, Drug, and Cosmetics Act; the Clean Water Act; and the Clean Air Act. We also coordinate agricultural biotechnology issues for USDA, including the Secretary's Advisory Committee on Biotechnology and 21st Century Agriculture (AC21). In engaging with EPA and other entities, we strive to ensure fully-informed decision-making in a number of ways: by clarifying the benefits and costs of federal actions on U.S. agriculture; by providing the best data on agricultural production and pesticide use; by effectively communicating the concerns of our stakeholders in all sectors of the agricultural industry; and by encouraging the use of quality science for issues related to pesticides and pest management throughout the government. To this end, I lead a highly-regarded, interdisciplinary technical staff with broad expertise, including entomology, plant pathology, weed science, agricultural economics, biotechnology, and risk assessment.

Several specific provisions of FIFRA require EPA to consult with the Secretary of Agriculture during different parts of the pesticide registration and cancellation processes, as well as on any proposed or final regulation issued under FIFRA. We also comment on a wide range of guidelines, risk assessments, and other relevant documents. USDA has a good working relationship with EPA, and consultation is an important part of that. Where regulations or other policy changes impact agriculture, USDA should be a full partner whose input on proposed actions should be considered vital. When there are differences of opinions, EPA should work

with USDA to find practical solutions that recognize the importance and needs of agricultural production, while still protecting human health and the environment.

America's abundant, affordable, high-quality, and safe food supply is exceptional, and the envy of the world, despite the uncertainties of weather, consumer markets, labor availability, pests and diseases, and production costs. Pesticides are a critical component of all farming systems. Whether it is the use of organic materials such as spinosad insecticide in organic cranberry production to manage fireworms, or plant-incorporated genetically-engineered (GE) Bt insecticide in controlling rootworms across millions of acres of corn production, pesticides are essential tools for farmers in managing pests, ensuring food security, and meeting market demands for quality. Therefore, it is extremely important to USDA that agriculture not be defined by those who are less than well-informed about agricultural production. Some recent press accounts, for example, portrayed EPA's decision to deny the petition to revoke tolerances of chlorpyrifos, a key insecticide used on over 50 crops, and to keep it on the market as being politically-based. What was lost in much of the reporting was that EPA had concluded "despite several years of study, the science addressing neurodevelopmental effects remains unresolved and that further evaluation of the science during the remaining time for completion of registration review is warranted" to the pesticide. USDA had serious concerns with EPA's risk assessment approach, as evidenced by our public comments throughout the last few years of the previous administration. We are confident that EPA will continue to regularly review any new data on chlorpyrifos, as it does for all pesticides, to make certain that pesticide use regulations remain in line with the newest science.

USDA also welcomed EPA's September 2016 classification of glyphosate, commonly known as "Roundup," as "not likely to be carcinogenic to humans." When EPA presented its analysis to its Scientific Advisory Panel in December 2016, USDA publicly commented in support of EPA's conclusion, which is in line with other major, risk-based assessments conducted by regulatory bodies in the European Union, Japan, Australia, and other countries. In fact, just last week, Health Canada concluded in its re-evaluation decision that glyphosate "is not genotoxic and is unlikely to pose a human cancer risk." Glyphosate has been used safely in the United States since the 1970s for general weed control in both agricultural and non-agricultural settings, and since the mid-1990s with genetically modified crops. Glyphosate is important to U.S. agriculture because of its excellent crop safety in GE crops, the broad range of weeds it controls, its applicability in minimum and no-till as well as conventional tillage, and flexibility and economy of use. USDA is coordinating with EPA on approaches to manage the emergence of Roundup-resistant weeds, through added information on labels and recommendations to diversify management practices and combine or alternate effective herbicides.

Agriculture depends on a strong, scientifically-based EPA to evaluate pesticides, both new and old, to ensure that, when following the label, they can be used as part of integrated pest management system. USDA supports the Pesticide Registration Improvement Extension Act as it will provide the certainty needed for registrants to get innovative technologies to the market, and for growers to know what tools they have available to address the next pest challenge.

Now let us discuss the role of the Endangered Species Act (ESA) in the registration of pesticides. Since 2013, EPA and the Services, which are the Fish and Wildlife Service and the National Marine Fisheries Service, have been working on nationwide ESA consultations for three key pesticides – chlorpyrifos, malathion, and diazinon. The Services analyze the effects of pesticides based on the maximum allowable use, as defined by the label, instead of the actual use on farms, while also considering how the impacts may be ameliorated based on the environmental fate and transport and subsequent toxicity for each threatened and endangered species. Among the many important uses of pesticides, chlorpyrifos is a key broad-spectrum insecticide, diazinon is impregnated in cattle ear tags to control flies, and malathion is part of the toolbox used to combat mosquitoes, maintain the cotton boll weevil program, and manage spotted wing drosophila, an extremely destructive invasive insect in fruit production. USDA supports appropriate reviews, protection, and where needed reasonable mitigation of federally listed species. However, we have concerns about the impacts that some of potential mitigation actions may have on U.S. agriculture. As you may know, EPA is currently required to evaluate the ecological impact of pesticides under the ESA, even though FIFRA, the law that directly regulates the registration of pesticides, already requires EPA to prevent "any unreasonable risk to man or the environment."—a standard which could possibly consider endangered species. This dual regulation under both ESA and FIFRA challenges EPA in meeting its statutory obligations to regularly review pesticide registrations. The first Biological Evaluations released to the public were over 12,000 pages long. The current workload is not sustainable. USDA has the motivation and expertise to offer advice and counsel to EPA and the Services. We look forward to working with the Services and EPA on these issues. Regulatory certainty is needed to ensure the continued safe use of pesticides, while offering necessary protections to endangered species and their habitat.

In closing, let me reiterate that our food supply is one of the safest anywhere in the world. The USDA Pesticide Data Program annually tests a variety of widely-consumed domestic and imported foods for the pesticide residues. In 2015, more than 99 percent of the samples tested had pesticide residues below the tolerance levels established by EPA, which in turn contain safety factors to protect the most vulnerable segments of the population, such as infants and children. These legal limits are established by our colleagues at EPA, and are but one example of the immensely important work EPA does to register safe and effective pesticides that are essential to both conventional and organic agricultural systems.

Thank you very much. I'll be glad to address any questions you may have.